

## REMARKS

Claims 1-25 were previously pending in this patent application. Claims 1-25 stand rejected. Herein, Claims 1, 9, and 19 have been amended. Accordingly, after this Amendment and Response, Claims 1-25 remain pending in this patent application. Further examination and reconsideration in view of the claim amendments and arguments set forth below is respectfully requested.

### 35 U.S.C. Section 102(b) Rejections

Claims 1-25 stand rejected under 35 U.S.C. 102(b) as being anticipated by Null, U.S. Patent No. 6,130,663 (hereafter Null). These rejections are respectfully traversed.

Independent Claim 1 recites:

An optical position-tracking system comprising:  
a first light beam steering device for *sweeping a first light beam* through a first angular range *to cause a reflection* of said first light beam by a target *back to said first light beam steering device*; and  
a second light beam steering device for *sweeping a second light beam* through a second angular range *to cause a reflection* of said second light beam by said target *back to said second light beam steering device*, wherein a position of said target is determined using a triangulation technique utilizing a first angular value of said first light beam and a second angular value of said second light beam, and wherein said first angular value and said second angular value depend on the existence of said respective reflection. (emphasis added)

It is respectfully asserted that Null does not disclose the present invention as recited in Independent Claim 1. In particular, the Office action (at page 2) cites Figures 1-4 and the Abstract, as disclosing the optical position tracking system recited in Independent Claim 1. On the contrary, Null is directed to a system unlike the optical position tracking system recited in Independent Claim 1. In particular, Null discloses a system (22) having infra-red detectors (130, 132, 140) and infra-red

emitters (176, 178). [Null; Figures 1-4; Col. 6, line 4 through Col. 8, line 22]. In operation, the infra-red emitters (176, 178) emit beams of IR energy via openings (170) while the infra-red detectors (130, 132, 140) detect IR energy reflected by an object through receiving apertures (160, 164, 162). *Id.* Instead of reflecting IR energy back to the infra-red emitters (176, 178), the object reflects IR energy to receiving apertures (160, 164, 162) which are located separately from the infra-red emitters (176, 178) and openings (170).

Unlike Null, Independent Claim 1 is directed to an optical position-tracking system. The system of Independent Claim 1 comprises "a first light beam steering device **for sweeping a first light beam** through a first angular range to **cause a reflection** of said first light beam by a target **back to said first light beam steering device**". (emphasis added) Further, the system comprises "a second light beam steering device **for sweeping a second light beam** through a second angular range to **cause a reflection** of said second light beam by said target **back to said second light beam steering device**". (emphasis added) Continuing, Independent Claim 1 also recites "wherein a position of said target is determined using a triangulation technique utilizing a first angular value of said first light beam and a second angular value of said second light beam, and wherein said first angular value and said second angular value depend on the existence of said respective reflection". While Null is directed to emitting/sweeping a light beam from an emitting device and reflecting the light beam towards a detecting device located separately from the emitting device, Independent Claim 1 is directed to using a light beam steering device to sweep the light beam and to causing a reflection of the light beam to go back to the light beam steering device. Therefore, it is respectfully submitted that Independent Claim 1 is not anticipated by Null and is in condition for allowance.

Dependent Claims 2-8 are dependent on allowable Independent Claim 1, which is allowable over Null. Hence, it is respectfully submitted that Dependent Claims 2-8 are patentable over Null for the reasons discussed above.

With respect to Independent Claim 9, it is respectfully submitted that Independent Claim 9 recites similar limitations as in Independent Claim 1. In particular, the system of Independent Claim 9 comprises "a first light beam steering device **for sweeping a first light beam** through a first angular range to **cause a reflection** of said first light beam by a target **back to said first light beam steering device**". (emphasis added) Further, the system comprises "a second light beam steering device **for sweeping a second light beam** through a second angular range to **cause a reflection** of said second light beam by said target **back to said second light beam steering device**". (emphasis added) Continuing, Independent Claim 9 also recites "wherein a position of said target is determined using a triangulation technique utilizing a first angular value of said first light beam and a second angular value of said second light beam, and wherein said first angular value and said second angular value depend on the existence of said respective reflection". Therefore, Independent Claim 9 is allowable over Null for reasons discussed in connection with Independent Claim 1.

Dependent Claims 10-18 are dependent on allowable Independent Claim 9, which is allowable over Null. Hence, it is respectfully submitted that Dependent Claims 10-18 are patentable over Null for the reasons discussed above.

With respect to Independent Claim 19, it is respectfully submitted that Independent Claim 19 recites similar limitations as in Independent Claim 1. In particular, the method of optically tracking a target of Independent Claim 19 comprises "**sweeping a first light beam** through a first angular range **at a first location** and determining a first angular value of said first light beam". (emphasis added) Further, the method of Independent Claim 19 comprises "**sweeping a second light beam** through a second angular range **at a second location** and determining a second angular value of said second light beam". (emphasis added) Continuing, Independent Claim 19 also recites "when said target **causes a reflection** of said first and second light beams **back to said first and second locations respectively**, determining a position of said target using a triangulation technique utilizing said first and second angular values which depend on the existence of said respective reflection". (emphasis added) Therefore, Independent Claim 19 is allowable over Null for reasons discussed in connection with Independent Claim 1.

Dependent Claims 20-25 are dependent on allowable Independent Claim 19, which is allowable over Null. Hence, it is respectfully submitted that Dependent Claims 20-25 are patentable over Null for the reasons discussed above.

CONCLUSION

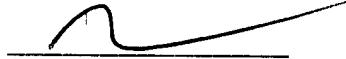
It is respectfully submitted that the above arguments and remarks overcome all rejections. For at least the above-presented reasons, it is respectfully submitted that all remaining claims (Claims 1-25) are now in condition for allowance.

The Examiner is urged to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Please charge any additional fees or apply any credits to our PTO deposit account number: 23-0085.

Respectfully submitted,  
WAGNER, MURABITO & HAO, LLP

Dated: 10/22/04

  
John P. Wagner, Jr.  
Registration No. 35,398

Two North Market Street, Third Floor  
San Jose, CA 95113  
(408) 938-9060